REMARKS

I. Introduction

Pending claims 1-33 have been examined and are rejected. Specifically, claims 1-6, 10-15 and 19-24 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,134,598 to Raman (hereinafter "Raman") in view of U.S. Patent No. 6,178,426 to Klein et al. (hereinafter "Klein"). Additionally, claims 7-9, 16-18, 25-27 and 31-33 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Raman in view of Klein, and further in view of U.S. Patent No. 5,911,776 to Guck (hereinafter "Guck"). Claims 28-30 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Raman, Klein and Guck, and further in view of U.S. Patent No. 6,330,598 to Beckwith et al. (hereinafter "Beckwith").

II. Claim Rejections – 35 U.S.C. § 103(a)

A. Claims 1-6, 10-15 and 19-24 are patentable over Raman and Klein.

As an initial matter, Applicants amend claim 1 to incorporate the features of claims 2-4 therein. Consequently, claims 2-4 are canceled to avoid redundancy. Similarly, the features of claims 11-13 and 20-22 are incorporated into claims 10 and 19, respectively, with claims 11-13 and 20-22 being canceled to avoid redundancy. Consequently, claims 5, 14 and 23 are amended to correct their dependency.

Applicants respectfully submit that these amendments are not intended to narrow the scope of the original claims, but are rather for precision of language and to explicitly recite within the claim what was believed to have already been implicitly defined therein, thereby

further clarifying the language of the original claims. Accordingly, these amendments should not foreclose application of reasonable equivalents.

Claims 1, 10 and 19

Claim 1 provides a method of accessing data at a server computer from a client computer connected via a network, the data being stored on a data storage device connected to the server computer. It is respectfully submitted that the proposed combination of Raman in view of Klein does not teach or suggest each and every element of claim 1, as amended. Specifically, Applicants respectfully submit that the proposed combination does not teach or suggest determining, at the server computer, whether the file identifier is valid, as claimed (*see* claims 1, 10 and 19).

To the contrary, Raman describes the steps taken by a client system in performing a given function on a resource (*i.e.*, data) specified by a URL (Raman: col. 5, lines 25-65; Fig. 5). Indeed, in Raman, even if the URL contains an extension that does not match any of the Extension Descriptors in the TheExtensionList, there is no determination as to whether a file identifier in the URL is valid (*c.f.*, Raman: col. 6, lines 7-11). Instead, Raman merely describes determining whether a client computer has a resource for performing a particular function on the data in a first format (Raman: claim 1). Thus, Raman fails to teach or suggest any determination of whether a file identifier provided in a URL is valid. Similarly, Klein fails to cure this deficiency of Raman.

Consequently, the proposed combination of Raman in view of Klein fails to teach and cannot possibly suggest step of "retrieving, at the server computer, the requested data from the data storage device in response to the request for data from the client computer," which is predicated on the file identifier being determined as valid. Thus, the combination of Raman in view of Klein fails to teach or suggest each and every element of claim 1 (*see also* claims 10 and 19).

Furthermore, claim 1 (*see also* claims 10 and 19) recites additional features which are neither taught nor suggested by the proposed combination of Raman in view of Klein.

For example and not by way of limitation, according to the claimed invention, a client computer need only provide a request for data (in the form of a URL command) to receive the data in a format usable by the client computer (*see* claims 1, 10 and 19). In the claimed invention, it is at the server computer that the request for data from the client computer is received and processed. As recited in claim 1, the steps of determining whether the file identifier is valid and, if the file identifier is determined to be valid, retrieving the requested data from the data storage device are performed at the server computer (*see also* claims 10 and 19). Furthermore, the steps of determining (after retrieving the requested data from the data storage device) whether the client computer can access the retrieved data in its retrieved form and, if it is determined that the client computer cannot access the retrieved data in its retrieved form, automatically converting the retrieved data into converted data that the client computer can access are also performed at the server computer (*Id.*).

Conversely, Raman describes performing a particular function on data, wherein a client computer itself initially determines in what first format the data is represented (Raman: col. 6., lines 1-11; and claim 1). Once the first format is determined, it is used to search the client computer for a first resource for performing the function on the data in the first format (Raman: col. 5, lines 33-43; and claim 1). If the search of the client computer fails to yield a first resource for performing the function on the data in the first format, the client computer is then searched for a second resource for performing the function on the data in any other, second data format (Raman: col. 5, lines 44-50; and claim 1). Upon finding such a second resource, the client computer itself searches for a parsing server that can parse the data from the first format to the second format (Raman: col. 5, lines 44-53; and claim 1). Once a suitable parsing server has been identified, the data is transmitted (*e.g.*, from the client computer) to the identified parsing server to be parsed into data in the second format (Raman: col. 6, lines 12-46; and claims 1-2). Then, the data parsed into the second format is received on the client computer, wherein the client computer uses the second resource on the client computer to perform the function on the parsed data (Raman: col. 6, lines 58-64; and claim 1).

Thus, in Raman, the client computer itself determines in what format the data is represented and whether the client has the resources to perform a desired function on the data in its current format (Raman: Abstract). If the client computer does not have the resources to perform the desired function on the data in its current format, but the client computer does have the resources to perform the desired function on the data in a different format, the client computer searches for a parsing server that can convert the data from the first format to the

second format (*Id.*). Upon locating a suitable parsing server, the data to be converted is transmitted to the parsing server and converted into the second format (*Id.*). Finally, the converted data is sent from the parsing server to the client computer, whereby the desired function can be performed on the converted data (*Id.*).

Accordingly, the system described in Raman is fundamentally different from the claimed invention, such that no reasonable combination of Raman and Klein would render the claims obvious. For example and not by way of limitation, in the claimed invention, if a request for an image file named "abc" as a .gif file is received at the server, but the image file "abc" is stored at the server as a .jpg file, the stored file abc.jpg is converted to a file abc.gif that is accessible by the requesting client.

Conversely, in Raman, to perform a particular function (*e.g.*, printing a file) on data (*e.g.*, file xyz), the client computer first determines in what format the data is represented, for example, as a .pdf file. If it is determined that the client computer cannot print the file xyz when it is in a .pdf format, it is determined whether the client computer can print the file xyz when it is in another format. Should the client computer be able to print the file xyz when it is in a another format, for example, when it is in a .doc format, the client computer searches for a parsing server that can convert the data from the unusable format into the usable format. In Raman, once such a parsing server is identified, the file xyz.pdf is transmitted to the identified parsing server in order to have the unusable file xyz.pdf converted into a usable file xyz.doc. Then, the parsed file, xyz.doc, is sent from the parsing server to the client computer to be printed.

Consequently, the client-oriented system of Raman is considerably more complex than the claimed invention. For example, Raman requires that each client computer system maintain numerous data structures in order to have data parsed from an unusable format into a format usable by the facilities of the client computer (Raman: Figs. 1b and 2; and col. 4, line 43 to col. 5, line 6).

Furthermore, the Examiner acknowledges that Raman fails to teach or suggest the feature of returning a locator to the client computer for locating the converted data, as claimed (Office Action: page 3). The Examiner, however, alleges that Klein makes up for this acknowledged deficiency of Raman by teaching returning a URL to the client for the client to retrieve requested data from the appropriate location (*citing* Klein: col. 10, lines 45-65).

To the contrary, Klein relates to an apparatus and a method for capturing data into a markup language data entry form (Klein: col. 1, lines 5-10). For example, data read by a magnetic stripe reader (MSR) can be provided to an HTML form that is designed to accept the data (Klein: col. 10, lines 40-42). In Klein, a CGI application performs processing on the data and then forwards the results to a server (Klein: col. 10, lines 56-58). If the web page resides on the same server, the server will deliver the web page to a client browser (Klein: col. 10, lines 58-60). However, if the web page resides on a different server, the current server returns a URL to the client browser, which in turn sends a request to the correct server for the page (Klein: col. 10, lines 60-64). The mere use of a URL to point to data stored on a server does not correspond to the recited feature of returning a locator to a client computer for locating converted data to be used by the client computer.

Further still, Raman does not teach or suggest "determining, at the server computer, whether the client computer can access the retrieved data in its retrieved form," as recited in claim 1 (*see also* claims 10 and 19). To the contrary, by the time the client computer sends a PARSE_AND_TRANSMIT message to the parsing server, requesting parsing of data from a first unusable format into a second usable format, the client computer has, as noted above, already determined (at the client computer) that the first (*i.e.* , original) format of the data is unusable to the client computer (Raman: col. 5, lines 44-53; col. 6, lines 12-28; and claim 1). Indeed, if the client computer hadn't already made this determination, it would not be contacting the parsing server (Raman: col. 5, lines 37-43).

In view of the above, claim 1 (*see also* claims 10 and 19) is not rendered obvious by the proposed combination of Raman in view of Klein.

Additionally, it is respectfully submitted that the Examiner fails to establish even a *prima facie* case of obviousness by providing a reasonable suggestion or motivation (absent impermissible hindsight) from the references themselves or the knowledge generally available to one of ordinary skill in the art at the time of the invention for combining Raman and Klein.

As noted above, Klein merely describes that if the results returned from the CGI application and a web page for formatting the results reside on the same server, then the server delivers the actual web page to the client browser. Conversely, if the web page resides on a server different from the current server to which the CGI application forwards its results, then the

current server returns a URL to the client browser, which can use the URL to request the web page from the correct server (Klein: col. 10, lines 56-63).

In Raman, a parsing sever that is responding to a PARSE_AND_TRANSMIT message, would always have the converted data, since it was actually converted at/by the parsing server. Consequently, a PARSE_AND_TRANSMIT_RESPONSE message being sent from the parsing server to the client computer always includes the actual parsed data, *e.g.*, in Data field 400 (Raman: Fig. 7b). Thus, it would not have been obvious to one of ordinary skill in the art to modify Raman so that a URL is returned, as described in Klein, because the situation described in Klein (*i.e.*, data to be returned to the client being located on a different server) would not arise in Raman.

Furthermore, the Examiner's purported motivation that such a combination "would have improved a load on the server by returning the locator to the client for the client locating the stored data in other storage such as [a] database and thereby decreased the number of steps of delivering data via the server which in turn will reduce the total traffics in the network" is flawed (*see* Office Action, page 3).

For example, even assuming *arguendo* that a combination of Raman and Klein would successfully allow a URL to be returned after a parsing server has converted the data from a first format into a second format, the data would still need to be requested and retrieved by the client computer system such that the desired function could be performed on the converted data (Raman: Abstract; claim 1). Consequently, requiring the client computer to request the

converted data from the parsing server, as opposed to directly delivering the converted data from the parsing server to the client computer, would not result in a reduction of the total traffics in the network 1a of Raman as alleged by the Examiner. Therefore, absent impermissible hindsight, it would not have been obvious to one of ordinary skill in the art at the time of Applicants' invention to combine Raman and Klein as alleged by the Examiner.

For at least the above exemplary reasons, claims 1, 10 and 19 are patentable over Raman and Klein, alone or in combination.

Claims 2-6, 11-15 and 20-24

As noted above, claims 2-4, 11-13 and 20-22 are canceled. It is respectfully submitted that claims 5-6, 14-15 and 23-24 are patentable at least by virtue of their dependency.

B. Claims 7-9, 16-18, 25-27 and 31-33 are patentable over Raman, Klein and Guck.

Guck fails to make up for the deficiencies of Raman and Klein, described above with respect to claims 1, 10 and 19. Thus, claims 7-9, 16-18, 25-27 and 31-33 are not rendered obvious by the proposed combination of Raman, Klein and Guck, at least by virtue of their dependency.

C. Claims 28-30 are patentable over Raman, Klein, Guck and Beckwith.

Guck and Beckwith (alone or in combination) fail to make up for the deficiencies of Raman and Klein, described above with respect to claims 1, 10 and 19. Thus, claims 28-30 are not rendered obvious by the proposed combination of Raman, Klein, Guck and Beckwith, at least by virtue of their dependency.

III. New Claims 34 and 35

Applicants add new claims 34 and 35, which are directed to disclosed but currently unclaimed subject matter. No new matter is introduced by way of these amendments. It is respectfully submitted that new claims 34 and 35 are patentable over the art of record, at least by virtue of their dependency.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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